

### **REMARKS/ARGUMENTS**

Claims 1-20 are pending in this application and stand rejected by the Examiner. Applicant requests reconsideration in light of the discussion below.

### **THE CLAIMS**

#### **Rejections under 35 U.S.C. §103(a)**

Claims 1-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Rawat et al. (U.S. Patent No. 6,662,340) (hereinafter "Rawat") in view of Lee et al. (U.S. Patent No. 5,946,691) (hereinafter "Lee"). Applicant respectfully traverses the rejections.

#### **Claims 5-6, 11-12, and 17-20**

Applicant submits that claim 5 is not suggested or made obvious by Rawat or Lee, considered individually or in combination. In addition to other features, Applicant's claim 5 specifically recites:

if the user information does not comprise an identifier corresponding to the first descriptor, updating the user information whereby an identifier corresponding to the first descriptor is included in the user information and the first information is associated with the identifier corresponding to the first descriptor; and

if the user information comprises an identifier corresponding to the first descriptor, updating the user information whereby the first information is associated with the identifier corresponding to the first descriptor. (Applicant's claim 5)

As recited above, if it is determined that the user information does not comprise an identifier corresponding to the first descriptor, then the user information is updated whereby an identifier corresponding to the first descriptor is included in the user information and the first information is associated with the identifier corresponding to the first descriptor. On the other hand, if the user information is determined to comprise an identifier corresponding to the first descriptor, then the user information is updated such that the first information is associated with the identifier corresponding to the first descriptor.

The above-recited features of claim 5 may be explained with respect to Fig. 7 in Applicant's specification and the corresponding description in paragraphs 0081 to 0085 of

Applicant's specification. Fig. 7 assumes that the "user information" initially comprises four identifiers and values associated with the identifiers: LAST\_NAME = Smith, FIRST\_NAME = Jessica, AGE = 25, and SEX = Female.

Now, let's consider the feature of claim 5:

if the user information does not comprise an identifier corresponding to the first descriptor, updating the user information whereby an identifier corresponding to the first descriptor is included in the user information and the first information is associated with the identifier corresponding to the first descriptor;

Form XYZ depicted in Fig. 7 comprises a field with a field descriptor "TEL#". Since the user information does not comprise an identifier corresponding to "TEL#", the user information is updated such that field descriptor "TEL#" is added to the user information and information "408-999-9999" entered in the corresponding field is associated with the identifier "TEL#" included in the user information. In this manner, the user information is updated to include a new identifier.

Now let's consider the feature of claim 5:

if the user information comprises an identifier corresponding to the first descriptor, updating the user information whereby the first information is associated with the identifier corresponding to the first descriptor.

Referring to the example of Fig. 7, the user information already comprises an identifier "AGE" corresponding to the field descriptor "AGE" of a field of form XYZ. In this case, the "first information" entered in the field, i.e., "28" is associated with "AGE" identifier in the user information. Accordingly, the user information is updated such that the "AGE" identifier is now associated with "28" (rather than "25").

Applicant submits that the above-described concepts are not taught or suggested by Rawat or Lee, considered individually or in combination. The Office Action admits on page 4 of the Office Action that the concepts are not taught by Rawat. However, the Office Action goes on to assert that the concepts are taught by Lee in the Abstract and col. 2 lines 1-15 of Lee. Applicant submits that Lee does not teach or suggest the concepts and the deficiencies of Rawat are not cured by Lee.

Lee teaches a method for filing data records within the structure of a contact manager. As described in Lee, a designated field for filing a data record is provided and referred

to as the "file as" field. Within this "file as" field, the user may enter any name, label, or filing identifier that the user desires for filing the contact record within the structure of a contact manager. The filing identifier identifies the location used by the computer system for filing the data record in a sorted list. The filing identifier in the designated field is received in response to receiving information within data fields of the data record and is automatically updated when information in the data fields is modified. (Lee: Abstract, Summary col. 1 lines 50-65; col. 3 lines 40-50).

Further, Lee describes that pre-defined filing formats are generated for the filing identifier. These filing formats are based upon the data fields of the data record. These filing formats represent selected combinations of the information in the fields of the record. For example, see the various filing formats 81, 83, 85, 87, and 89 depicted in Fig. 4B of Lee (Lee: col. 8 line 60 - col. 9 line 10). The predefined filing format fields are automatically updated if the information received in at least one of the data fields of the record on which the filing format depends is modified. The filing identifier is updated with the updating of the predefined filing format fields. (Lee: Abstract; Summary col. 1 line 66 - col. 2 line 15).

Applicant submits that Lee has nothing to do with user information storing identifiers corresponding to field descriptors for fields in electronic forms. Lee merely teaches about data records and how a specific field is provided that is used for filing the record and formats associated with that specific field -- the concept of user information comprising identifiers corresponding to field descriptors determined for fields in an electronic form, as recited in claim 5, is absent in Lee.

Applicant further submits that updating the filing identifier or updating the predefined filing format described in Lee is completely different from the two "if . . ." features recited in claim 5. As described above, for the "if" features, different actions are performed based on whether or not the user information comprises an identifier corresponding to the first descriptor of the field of an electronic form. If an identifier corresponding to the descriptor is not in the user information, then the user information is updated to add an identifier corresponding to the field descriptor and the information entered in the field is associated with the newly added identifier. If an identifier corresponding to the descriptor is in the user information, then the user

information is updated such that the information entered in the field is associated with the identifier. Applicant submits that this is not taught by Lee either when the filing identifier is updated or when the predefined filing formats are updated. As described in Lee, updating the filing identifier based upon information entered in the other data fields merely changes the information in the "file as" field to be used for filing the record. Similarly, updating the predefined filing format merely changes the format associated with the filing identifier. Applicant submits that neither of these actions inserts a new identifier in user information corresponding to a field descriptor of a field on an electronic form and then associates it with information entered in the field, as recited in claim 5. Further, neither of these actions updates user information such that information entered in a field is associated with an identifier in the user information, as recited in claim 5.

Applicant thus submits that the "if . . ." features recited in claim 5 are not taught or suggested by Lee. Accordingly, the deficiencies of Rawat are not cured by Lee. Consequently, Applicant submits that even if Rawat and Lee were combined as suggested by the Office Action (even though there appears to be no motivation for the combination), the resultant combination would not teach or suggest all the features of claim 5. Applicant thus submits that claim 5 is patentable over a combination of Rawat and Lee for at least these reasons.

Applicant submits that independent claims 11 and 17 are also patentable over a combination of Rawat and Lee for at least a similar rationale as discussed above for claim 5, and others.

Applicant further submits that dependent claims 6 and 19 that depend from claim 5, claim 12 that depends from claim 11, and claims 18 and 20 that depend from claim 17 are also patentable over Rawat and Lee for at least a similar rationale as discussed for the allowability of the independent claims from which they depend. The dependent claims are also patentable for additional reasons.

Claims 1-4, 7-10, and 13-16

Applicant submits that claim 1 is not suggested or made obvious by the combination of Rawat and Lee. In addition to other features, claim 1 specifically recites:

updating the set of descriptors whereby an identifier corresponding to the second descriptor is included in the set of identifiers stored for the user and the second value is associated with the identifier corresponding to the second descriptor. (Applicant's claim 1, in part)

In rejecting this claim, the Office Action incorporates the rejections of claim 5. Applicant submits that the "*updating . . .*" feature recited in claim 1 comprises several of the features of the "*if the user information does not comprise an identifier. . .*" feature recited in claim 5. Since the Office Action admits with respect to claim 5 that this feature is not taught or suggested by Rawat, Applicant submits that the Office Action also concedes that the "*updating . . .*" feature recited in claim 1 is not taught by Rawat.

Further, as discussed above for claim 5, the concepts of updating user information to include an identifier corresponding to a field descriptor for a field in an electronic form and associating the information entered in the field with the newly included identifier is not taught or suggested by Lee. Accordingly, Applicant submits that the "*updating . . .*" feature of claim 1 is not taught or suggested by Lee.

Consequently, the deficiencies of Rawat are not cured by Lee. Applicant submits that even if Rawat and Lee were combined as suggested by the Office Action (even though there appears to be no motivation for the combination), the resultant combination would not teach or suggest at least the "*updating . . .*" feature of claim 1. Applicant thus submits that claim 1 is patentable over a combination of Rawat and Lee for at least this reason.

Applicant submits that independent claims 7 and 13 are also patentable over a combination of Rawat and Lee for at least a similar rationale as discussed above for claim 1, and others.

Applicant further submits that dependent claims 2-4 that depend from claim 1, claims 8-10 that depend from claim 7, and claims 14-16 that depend from claim 13 are also patentable over Rawat and Lee for at least a similar rationale as discussed above for the allowability of the independent claims. The dependent claims are also patentable for additional reasons.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

/Sujit B. Kotwal/

Sujit B. Kotwal  
Reg. No. 43,336

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 650-326-2400  
Fax: 415-576-0300  
SBK:mg  
60994837 v1